

**BEFORE THE
ILLINOIS COMMERCE COMMISSION
DOCKET NO. 00-0393**

**AFFIDAVIT OF
SIDNEY L. MORRISON**

Q. PLEASE STATE YOUR NAME.

A. My name is Sidney L. Morrison.

**Q. HAVE YOU PROVIDED THE COMMISSION WITH YOUR RESUME
INCLUDING YOUR PROFESSIONAL WORK EXPERIENCE AND
YOUR BACKGROUND?**

A. Yes, I have. It is my understanding that my resume is included with Mr.
Starkey's testimony as Attachment MTS-3.

Q. WHAT IS THE PURPOSE OF THIS AFFIDAVIT?

A. Mr. Starkey asked that I review Ameritech's testimony in this proceeding for
purposes of providing my opinion on the many technical limitations that will
result, according to Ameritech, from implementing the Commission's original
Order requiring that facilities comprising SBC/Ameritech's Project Pronto
upgrade be unbundled. In reviewing Ameritech's testimony I identified a number
of areas wherein minimum modification to the manner by which Ameritech
apparently plans to deploy the Pronto architecture would result in significant

enhancements in flexibility while overcoming many of the problems identified by Ameritech's witnesses.

Q. PLEASE PROVIDE AN EXAMPLE.

A. In the Direct Testimony on Rehearing of Christopher J. Boyer, CJB-1, Mr. Boyer states that:

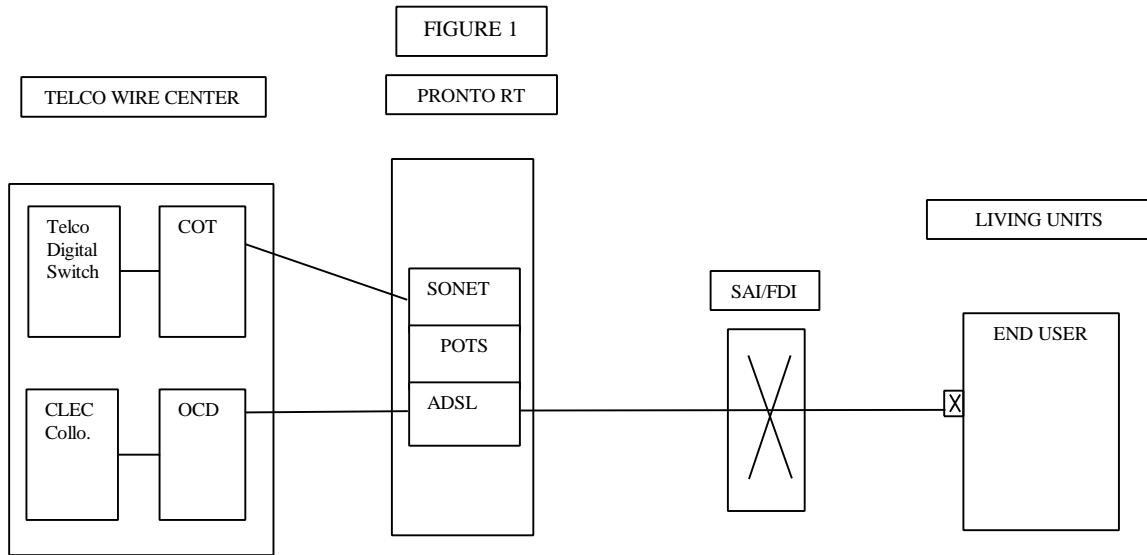
“In order to provision and ADSL service over this architecture a standard copper facility (analogous to a telephone line) is used to transport both voice and data from the end user customer premises to the NGDLC system placed within the RT site. This copper facility terminates on the back plane of the NGDLC system and is subsequently routed to a slot in a channel bank.”

In the Direct Testimony on Rehearing of Christopher J. Boyer, Page 22, lines 5 – 12, Mr. Boyer states again that the hard connection at the back plane of the RT is the reason the facility from the RT to the SAI/FDI can not be unbundled and must be used with the NGDLC to provide connectivity from the RT site to the user's customer premise.

Q. COULD THE CONFIGURATION DESCRIBED BY MR. BOYER BE MODIFIED SLIGHTLY TO OVERCOME THE DIFFICULTY HE ALLUDES TO?

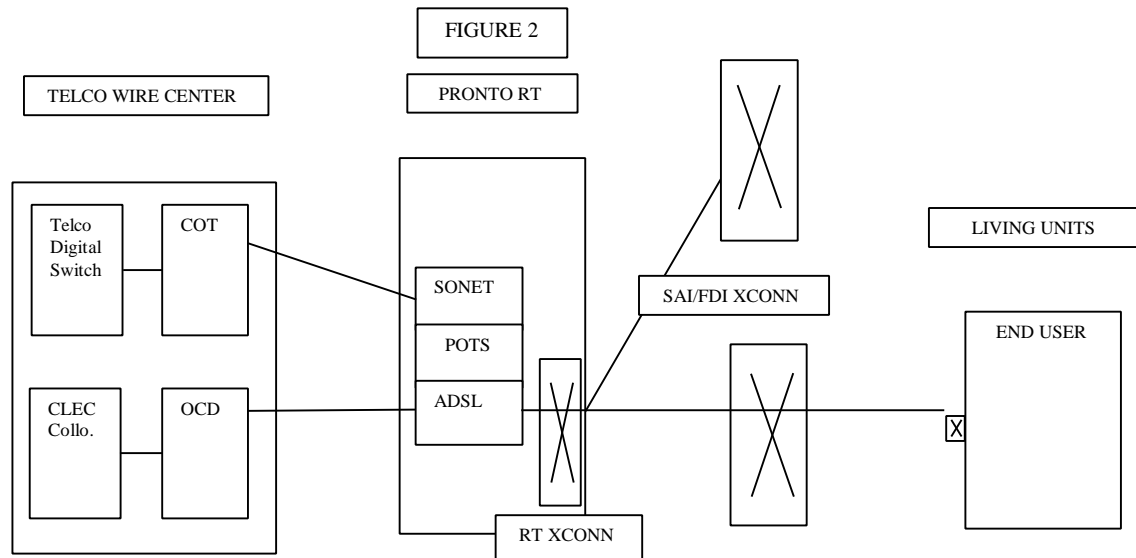
A. Yes, it could. By configuring the Project Pronto RT architecture in the manner described by Mr. Boyer (see FIGURE 1 below), Ameritech has, perhaps by design, made the option to provide unbundled network elements from the RT to

the SAI/FDI more difficult. It is important to note that this configuration is purely an engineering choice on the part of Ameritech Illinois.



The Project Pronto configuration could easily be reconfigured to provide maximum flexibility at the RT (see FIGURE 2 below) by employing a simple cross connect facility linking the remote terminal site with all SAI connections it supports. The architecture described below in FIGURE 2 would provide an additional cross connect point to facilitate unbundling the network elements consisting of the RT and the distribution cable pair to the SAI/FDI. Additionally, the RT cross connect point is advantageous for Ameritech Illinois. If a cable pair between the RT and SAI/FDI becomes impaired and can not be repaired or repaired in a reasonable time, the cable pair to the RT back plane can be changed without the complexities needed to change cards and the associated time slot changes to the central office, COT, and address changes for the ADSL service. The Project Pronto architecture described by Mr. Boyer would expose the back plane, slot and

card to the same risk as the cable and pair between the SAI/FDI and the remote terminal without any ability to quickly separate the two and reconfigure a workable solution.

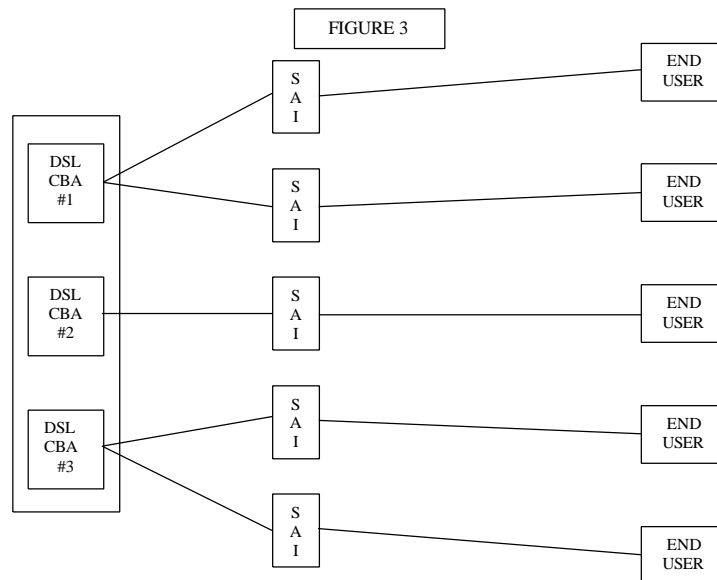


Q. WOULD THE ARCHITECTURE CONFIGURATION YOU’VE DESCRIBED ABOVE ALSO ALLEVIATE MANY OF THE PROBLEMS AMERITECH’S WITNESSES IDENTIFY WITH PROVIDING ACCESS TO PERMANENT VIRTUAL PATHS (“PVPS”).

A. Yes, it would. Mr. Boyer states as follows at Page 34, lines 6 – line 10 of his testimony:

“The Project Pronto design allows for one dedicated PVP per channel bank assembly. Thus, in order to provide a CLEC a PVP as a UNE, Ameritech Illinois would have to dedicate an entire channel bank to that CLEC’s use; once a single CLEC controlled the PVP, no other CLEC would be able to transport their data traffic to the serving central office”.

The above statement is true as the Project Pronto architecture is illustrated in Mr. Boyer's testimony attachment CJB-6. I've included a similar diagram in FIGURE 3 below demonstrating that indeed, if a CLEC owns the PVP serving a DSL CBA #2, given Ameritech's proposed architecture for its Pronto network, other carriers could be precluded from providing service to the end users accessed through the SAI connected to DSL CBA #2.

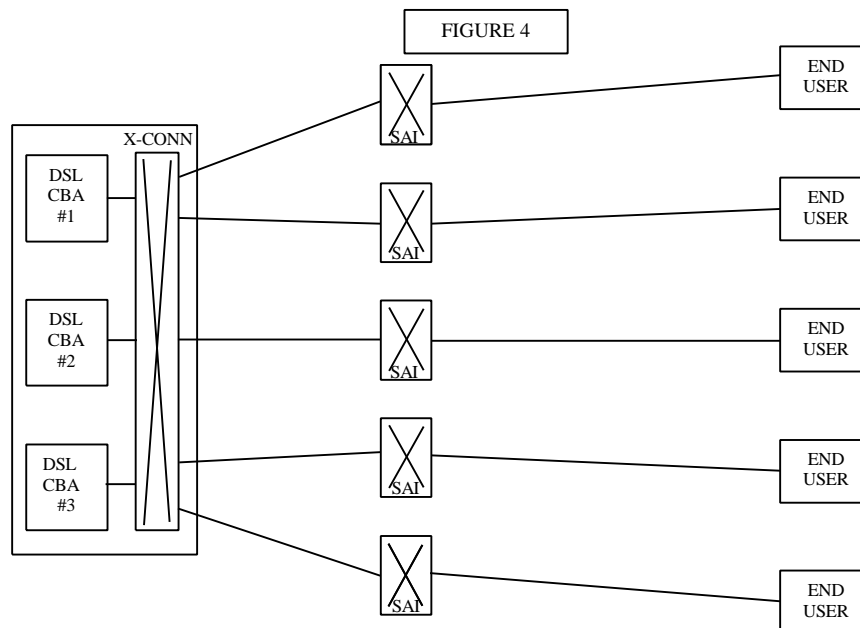


However, there is a fundamental problem with the design of the RT and the SAIs it is capable of accessing as described in FIGURE 3. FIGURE 3 illustrates that DSL CBA #1 and #3 cannot access customers in the SAIs being served by DSL CBA #2. When DSL CBA #2 becomes exhausted for any reason, i.e. PVP exhaust, port exhaust, etc., there is no ability in the design that allows excess capacity from DSL CBA #1 and #3 to provide relief for demand in the DSL CBA #2 serving area interface. Complicating matters is the possibility that demand in DSL CBA #2 will go unmet while unused capacity in DSL CBA #1 and #3 could

be stranded as a result of lower demands in their serving areas. This is an important flaw in the Ameritech architecture as described by Mr. Boyer.

Q. HOW COULD THE SHORTCOMINGS OF THIS ARCHITECTURE BE REMEDIED?

A. I've included as FIGURE 4 below an illustration of how Ameritech could employ the same cross connect management method I described earlier to provide maximum flexibility and eliminate the risk of stranded capacity. This same system would allow a CLEC to own a complete DSL CBA and not exclude other CLECs from accessing that, or any other SAI (or the customers served by any SAI). An additional benefit is realized when growth is needed. Growth can be added one shelf at a time and utilized to service any of the SAIs relying upon the remote terminal.



183 **Q. WOULD THE ADDITION OF A CROSS-CONNECT SYSTEM SERVING**
184 **THE REMOTE TERMINAL ADD SIGNIFICANT ADDITIONAL COST**
185 **OR COMPLEXITY TO THE PRONTO ARCHITECTURE?**

186 A. No, it would not. A cross connect system as I've described above is a relatively
187 inexpensive piece of equipment compared to the remote terminal equipment it
188 would serve. Likewise, addition of such a system would undoubtedly provide
189 Ameritech additional flexibility and allow it to use its Pronto facilities more
190 efficiently, thereby conserving future resources.

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192 **Q. DOES THIS CONCLUDE YOUR AFFIDAVIT?**

193 A. Yes, it does.
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